

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: FCA US LLC MONOSTABLE
ELECTRONIC GEARSHIFT LITIGATION

MDL No. 2744

Case Number 16-md-02744
Honorable David M. Lawson
Magistrate Judge David R. Grand

DEDRA MANEOTIS,

Plaintiff,
v.

Case Number 17-10351
Honorable David M. Lawson

FCA US, LLC,

Defendant.

**STIPULATION TO EXTEND TIME FOR PLAINTIFF DEDRA MANEOTIS
TO RESPOND TO DEFENDANT’S MOTION FOR JUDGMENT ON THE
PLEADINGS (DKT. #171)**

The Parties, by and through their respective counsel, hereby stipulate and agree that the time for Plaintiff Dedra Maneotis to respond to Defendant’s Motion for Judgment on the Pleadings (dkt #171), if necessary, be extended by 7 days, or until December 13, 2017.

On Monday, December 4, 2017, the Parties submitted a Stipulation (dkt #177) and Proposed Order to file an amended complaint for Plaintiff Dedra Maneotis in lieu of filing a Response to Defendant’s Motion for Judgment on the

Pleadings. Additionally, Plaintiff filed the amended complaint for which she was seeking Court approval (dkt #178).

The Response to Defendant's Motion for Judgment on the Pleadings is due today, December 6, 2017. If the Court denies Plaintiff the opportunity to file the amended complaint, and instead orders a Response to the Motion for Judgment on the Pleadings be filed, Plaintiff respectfully requests a one-week extension (until December 13, 2017) to file this Response.

Importantly, Plaintiff's counsel and the primary contact for her case, Christopher Pitoun, had to immediately evacuate (with his family) his Los Angeles home during today's early morning hours due to the threatening and spreading California wildfires. Mr. Pitoun has been unable to access a computer and has had trouble communicating with other attorneys and individuals throughout the day. As a result of these unforeseen circumstances, Plaintiff respectfully requests an extension of time to file her Response, if the Court rejects the amended complaint and orders a Response be filed.

The Parties have stipulated and agreed that the time for Plaintiff Dedra Maneotis to respond to Defendant's Motion for Judgment on the Pleadings (dkt #171), if a Response is deemed to be necessary by the Court, be extended by 7 days, or until December 13, 2017.

Stipulated and Agreed on December 6, 2017:

/s/ Michael R. Williams (w/consent)

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CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2017, I electronically filed the foregoing document with the Clerk of the Court using the ECF System, which will send notification to the ECF counsel of record.

By: /s/ E. Powell Miller
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